

TENNESSEE DEPARTMENT OF ENVIRONMENT AND CONSERVATION ENVIRONMENTAL FIELD OFFICE

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September 1, 2011

Mr. Paul Boyer City of Columbia 707 N. Main Street Columbia, TN 38401

Re: Compliance Assessment Report

MS4 – City of Columbia NPDES Permit Number TNS075248 Maury Counties

Dear Mr. Boyer:

On August 25, 2011, I met with Jim Fuller, Armond Harris, David Klutsenbaker, and John Williams to discuss the City's Municipal Separate Storm Sewer System (MS4) program. The purpose of the meeting was to review Columbia's progress towards full compliance with the NPDES permit and to help address any issues the program is having with the new permit that became effective February 17, 2011.

The Division received Columbia's Notice of Intent on January 28, 2011. Coverage under the NPDES stormwater permit was issued on February 17, 2011. The five sections of the permit were discussed with the group. Based on these discussions the program seems to be on track for its various first year goals within each section. Some of the items discussed regarding each section are included below:

Section 1 - Public Education and Outreach and Public Involvement/Participation

The Program performs stormwater presentations, and provides information through the city's website and flyers. In addition, stormwater related commercials are aired on the local public television station.

Section 2 – Illicit Discharge Detection and Elimination

The City performs routine inspections around the MS4 area. Annual dry weather screenings were recently conducted as well.

Section 3 - Construction Site Stormwater Runoff Program

The program ensures all projects have applicable state permits before their review process begins. Preconstruction meetings are performed, and the program tries to address stormwater related issues on the front end of projects.

Section 4 – Permanent (Post-Construction) Stormwater Management in New Development and Redevelopment Program

The City's planning department requires all landscaping to be complete before a certificate of occupancy is issued. Site inspections are conducted after the certificate of occupancy is issued. Additionally, the city requires forebays in detention basins.

Section 5 - Pollution Prevention/Good Housekeeping for Municipal Operations

Within the MS4, streets and gutters are swept regularly. Inlets and other stormwater related structures are also cleaned and maintained. All P.E.'s within the program have received Level I EPSC training and are planning on obtaining Level II.

One area identified during the review that appeared to need addressing is better communication among the different departments that fall within the MS4 program. While the MS4 program may be managed out of the Engineering Department, there are various aspects of the program and permit that are handled by different departments. These departments need to understand their specific role, and all departments involved in the program need to work together to ensure permit compliance.

I would like to thank you for your time and assistance during the inspection. If you have any further questions concerning either our inspection or this report, please feel free to contact me at (931) 560-1303.

Sincerely,

Scott Howell

cc:

Environmental Specialist

Division of Water Pollution Control

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DWPC, Enforcement and Compliance Section, Nashville Central Office

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